

Serial No. 09/933,625

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REMARKS

These remarks follow the order of the paragraphs of the office action. Relevant portions of the office action are shown indented and italicized.

DETAILED ACTION

This is in response to Request for Continued Examination submitted on 11/19/05 in which claims 1-37 are pending.

Response to Arguments

2. Applicant's arguments with respect to claims 1-37 have been considered but are moot in view of the new ground(s) of rejection.

Claim Rejections - 35 USC § 112

3. The following is a quotation of the second paragraph of 35 U.S.C. 112: The specification shall conclude with one or more claims particularly pointing out and distinctly claiming the subject matter which the applicant regards as his invention.

4. Claim 31 recites the limitation "the user client device" in line 20. There is insufficient antecedent basis for this limitation in the claim.

In response, the applicant respectfully states that Claim 31 is amended to delete the word 'user' from the phrase 'the user client device'. This overcomes the Claim Rejections - under 35 USC § 112, and claim 31 is allowable.

Claim Rejections - 35 USC § 102

5. The following is a quotation of the appropriate paragraphs of 35 U.S.C. 102 that form the basis for the rejections under this section made in this Office action:

A person shall be entitled to a patent unless -

(e) the invention was described in (1) an application for patent, published under section 122(b), by another filed in the United States before the invention by the applicant for patent or (2) a patent granted on an application for patent by another filed in the United States before the invention by the applicant for patent, except that an international application filed under the treaty defined in section 351(a) shall have the effects for purposes of this sub-subsection of an application filed in the United States only if the international application designated the United States and was published under Article 21(2) of such treaty in the English language.

6. Claims 1-37 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application No. 2002/0191557 to Chow et al.

DOCKET NUMBER: JP920010520US1

11/33

Serial No.: 09/933,625

1 In response, the applicant respectfully states that Claims 1 - 37 are indeed not anticipated by U.S.
2 Patent Application No. 2002/0191557 to Chow. The present invention, claimed in Claims 1 - 37:
3 Provides methods and apparatus for accessing and controlling services, such as home
4 automation services, visually employing established wireless, cellular telecommunication
5 technologies for voice communications. In example embodiments, users of personal
6 portable devices connect to services over dial-up, wireless, cellular, circuit-switched
7 voice telephone networks, receive and display listings of available services and use these
8 listings to access and manipulate the services.

9 Whereas, the cited art to Chow et al, US Patent Application No. 2002/0191557, filed: June 14,
10 2001, is entitled: "Broadband network with enterprise wireless communication system for
11 residential and business environment". The abstract of Chow reads:

12 "The present invention sets forth a network-centric service distribution architecture and
13 method that integrates a wireless access system/service in the residence, SOHO, business
14 or public environment through the use of a local broadband network, such as a
15 Residential-Business Broadband Network (RBN), to the service provider's broadband
16 transport network and to a service provider's broadband packet network that facilitates
17 end-to-end packet telecommunication services. The Media Terminal Adapter is coupled
18 via the RBN to the access port(s) and via the service provider's broadband transport
19 network to the service provider's broadband packet network. The access port is coupled to
20 the Media Terminal Adapter via either a RBN (e.g., a Local Area Network--LAN) or
21 simply via a traditional POTS line interface. The access port receives and sends wireless
22 signals to a plurality of RBN devices, allowing the user to control these, devices remotely
23 from the residence, business, SOHO or public environments. The integration of an RBN
24 to a service provider's broadband packet network allows a subscriber to communicate at
25 home and at the office with one communication device anytime anywhere. A service
26 provider can deploy services in an integrated voice, data and multimedia environment
27 cost effectively based on one broadband packet network."

DOCKET NUMBER: JP920010520US1

12/33

Serial No.: 09/933,625

1 Thus Chow is concerned with enabling remote access to a residential/SOHO network via a
2 virtual private network service (VPN) over a broadband transport data network owned by the
3 VPN provider and is not concerned with the enabling of remote control of services at a
4 residential network without the necessity of a service provider as in claims 1-37. Also, Chow is
5 not concerned with providing a method for interaction, or indeed any method. Chow is an
6 architecture and/or apparatus to support that architecture. Apparatus claims in the present
7 application support the methods of the invention. Thus claims 1-37 are allowable over the cited
8 art.

9 *1. As per claims 1, 27- 29, Chow et al teaches a method for a user to interact with at*
10 *least one remote service accessible through a home data distribution network said home*
11 *data distribution network comprising an aggregation of at least one communications*
12 *media and at least one communications protocol used access said at least one remote*
13 *service from a serving entity, comprising: employing only one of a cellular voice network*
14 *and a PSTN, said user connecting a serving entity attached to said home data*
15 *distribution network using a client device attached to a wireless, circuit-switched, voice*
16 *telephony network (See page 4, paragraph [0036], when a home's or business s*
17 *resources are connected to a home or business networking platform that has broadband*
18 *packet network users with predetermined security privileges can remotely access any or*
19 *all resources/appliances in and around the home or office via the service providers... See*
20 *page 5, paragraph [0054, 0058]), obtaining and viewing a least one remote service from*
21 *accessible remote services from said serving entity accessible remotely via said home*
22 *network from said serving entity using least one of said communications media and one*
23 *of said communications protocols (See page 7, paragraph [0098-0101]); selecting said*
24 *at least one remote service from said list; selecting said at least one communications*
25 *media and at least one communications protocol that said selected at least one service*
26 *uses; and accessing and viewing said least one remote service in obtaining desired*
27 *results (See page 6, paragraph [0075-0078]).*

28 In response, the applicants respectfully state that Chow apparently does not anticipate claim 1.

29 Claim reads:

30 1. A service interaction method comprising a user interacting with at least one remote
31 service accessible through a home data distribution network, said home data distribution
32 network comprising an aggregation of at least one communications media and at least one
33 communications protocol used to access said at least one remote service from a serving
34 entity, the step of interacting comprising:

DOCKET NUMBER: JP920010520US1

13/33

Serial No.: 09/933,625

1 employing only one of a cellular voice network and a PSTN, said user connecting to a
2 serving entity attached to said home data distribution network using a client device
3 attached to a wireless, circuit-switched, voice telephony network,

4 obtaining and viewing a list of at least one remote service from accessible remote services
5 from said serving entity accessible remotely via said home network from said serving
6 entity using at least one of said communications media and one of said communications
7 protocols;

8 selecting said at least one remote service from said list;

9 selecting said at least one communications media and at least one communications
10 protocol that said selected at least one service uses; and

11 accessing and viewing said at least one remote service in obtaining desired results.

12 A review of the cited portion of Chow (0036) which reads

13 [0036] a. When a home's or business's resources are connected to a home or business
14 networking platform that has broadband access to the service provider's broadband packet
15 network, users with predetermined security privileges can remotely access any or all
16 resources/appliances in or around the home or office via the service provider's broadband
17 packet network. Thus, the home or business networking platform with the broadband
18 network connectivity establishes a communications conduit for a subscriber at one end of
19 the conduit to remotely access, control, monitor, and share the home's or business's
20 resources at the other end of the conduit. This conduit also enables the delivery of
21 traditional communication/entertainment services and new services. Depending on the RF
22 coverage of the AP 102, the power of the AP 102 may be adjusted for coverage up to, for
23 example, a mile or more in radius and therefore the services architecture may include the
24 campus, public, or enterprise environments.

25
26 does not support the statement of the office communication above. Chow doesn't do the steps of
27 employing, selecting, and accessing of claim 1 in any shape or format. A review of Chow reveals
28 that there really is no step of claim 1 in Chow.. Claim 1 performs a "service interaction method"
29 while Chow is focused on a system architecture and the apparatus that are involved in that system
30 architecture. Furthermore, Chow's system architecture necessitates the use of a broadband

DOCKET NUMBER: JP920010520US1

14/33

Serial No.: 09/933,625

1 services service provider, while embodiments of the method of claim 1 does not require the use
2 of a service provider. Chow is applicable to an entirely different application space than the
3 applicants' invention. As Chow's claim 1 states, the application space for Chow is applicable to
4 "...[A] network-centric service distribution architecture that integrates a wireless access service
5 in a local Residential/Business Broadband Network (RBN) environment through the use of a
6 local RBN to a service provider's broadband packet network that facilitates end-to-end packet
7 telecommunication services..." The terms "integrates" "wireless access service in an RBN" and
8 "service provider's broadband packet network" are very central to Chow's invention. None of
9 these are required by the applicants' invention, which at a minimum can be implemented using a
10 personal cell phone device, a regular cellular network, and a regular PSTN network to access an
11 control remotely in-house services. In the applicants' invention in claims 1-37, there is no
12 necessity to employ any kind of broadband network, there is no necessity to involve any service
13 provider, and there is no need to integrate the residential network with that of a service
14 provider's. Note that the use of a service provider will also require it to modify his internal
15 operation. This is explicitly stated in claim 1 where the service provider needs to install and
16 operate a Network Server Platform (NSP), 108 in Fig. 1, that is intimately coupled with
17 equipment installed in the residential/SOHO network, namely the Media Terminal Adapter
18 (MTA) and one-or-more Access Ports (APs), 104 and 102 in Fig. 1, respectively.

19 Thus, even when Chow uses similar words or phrases, applicants respectfully state that the
20 context of Chow should be accounted for when the applicants' and Chow's inventions are
21 compared. Same and/or similar words are used in different context and steps and elements in
22 claims 1 than as used in Chow.

23 The cited portion to Chow, paragraph [0036] states a use of a wireless network. However, this
24 wireless network is the one residing in the residential/SOHO network and not a wireless,
25 circuit-switched, voice telephony network, as in claims 1. Furthermore, this paragraph
26 emphasizes the remote access of any or all resources/appliances in an around the home or office
27 (just like the applicants' invention does), however, "...via the service provider's broadband
28 packet network..." which is a teaching very central to Chow's invention.

DOCKET NUMBER: JP920010520US1

15/33

Serial No.: 09/933,625

1 The cited portion to Chow, Pg. 5, paragraphs [0054] and [0058] refer indeed to the use of a
2 PSTN or a cellular network but not as in claim 1. These are the only networks needed in the
3 Claimed applicants' invention contrary to Chow's invention where these networks are example
4 networks that can be used to connect user devices to a service provider's broadband network.

5 The cited portion to Chow, Pg. 7, paragraphs [0098-0101] refer to example scenarios of what an
6 end-user can do remotely. These paragraphs do not teach the "viewing" of services, which per the
7 applicants' invention represent the step by which the remote user views what services he/she can
8 access. Furthermore, what is described in paragraphs [0098-0101] does not constitute innovative
9 teachings even for Chow's invention, as, for example, remotely accessing and manipulating a
10 PC desktop is a capability that existed long before Chow's invention application (and hence we
11 specifically avoided covering it in the applicants' invention). These do not anticipate any of the
12 steps of claim 1.

13 The cited portion to Chow, Pg. 7, paragraphs [0075-0078] these paragraphs do not teach the
14 steps of selecting a service to control, and selecting a communications medium and protocol over
15 which to control the service. They merely provide a (well-established) example of using a
16 specific protocol (short-messaging) to control a remote device (a thermostat). However, the
17 applicants' invention does not imply the use of any specific protocol. Furthermore, the short
18 messaging protocol is a protocol between the user's mobile phone and a provider's short message
19 services. Note that no end-devices can be directly controlled by a short message, which means
20 that short messages sent by the end-user need to be translated to another protocol by the
21 short-message service provider. As before, this too implies the necessity of a service provider
22 between the remote user and the in-home services to be controlled, which is a step not required
23 by the applicant's invention.

24 For the above reasons, the applicants respectfully state that claim 1, and for the same reasons,
25 claims 27-29 are allowable and distinct from previous teachings.

DOCKET NUMBER: JP920010520US1

16/33

Serial No.: 09/933,625

1 2. As per claim 2, Chow et al teaches the claimed invention as described above.
2 Furthermore, Chow teaches wherein the client device is portable (See page 5, paragraph
3 [0054, and 0058] and figure 1).

4 In response, applicants respectfully state that they take exception with the alleged equivalencies
5 of claim 2 and Chow. Applicants have shown that there apparently exists no client device in the
6 inventive portion of Chow. Thus claim 2 is allowable for itself and because it depends upon
7 claim 1.

8 3. As per claim 3, Chow et al teaches the claimed invention as described above.
9 Furthermore, Chow et al teaches wherein the client device is a cellular telephone (See
10 page 5, paragraph (0054-0058] and figure 1).

11 In response, applicants respectfully state that they take exception with the alleged equivalencies
12 of claim 3 and Chow. Applicants have shown that there apparently exists no client device in the
13 inventive portion of Chow. In order to protect an advantageous embodiment claim 3 is amended
14 to be a detailed claim, certainly not anticipated previously, and claim 3 is allowable for itself and
15 because it depends upon claim 1.

16 4. As per claim 4, Chow et al teaches the claimed invention as described above.
17 Furthermore, Chow et al teaches Valencia teaches a wherein the step of connecting
18 includes dialing-up directly to the serving entity (See pages, paragraph [0033-0054]).

19 In response, the applicants assume that the examiner wanted to say "...Furthermore, Chow et al
20 teaches wherein the step of connecting..." A review of the cited portion Chow paragraphs
21 [0033-0054] shows that Chow indeed do not teach a step of dialing-up directly the serving entity
22 (which in the applicants' invention resides in the home network), but rather using a dial-up
23 connection to access the service providers' packet network and from there the broadband
24 transport network. In addition, these paragraphs further emphasize the differences between the
25 Chow's and applicants' inventions as stated in the applicants' response to Claims 1 and 27- 29.
26 Applicants respectfully state that they take exception with the alleged equivalencies of claim 4
27 and Chow. Thus claim 4 is allowable for itself and because it depends upon claim 1.

DOCKET NUMBER: JP920010520US1

17/33

Serial No.: 09/933,625

1 *5. As per claim 5, Chow et al teaches the claimed invention as described above.*
2 *Furthermore, Sharma teaches wherein the viewing is performed employing a viewing*
3 *device collocated with said client device (See page 6, paragraph [0075-0078]).*

4 In response, the applicants assume that the examiner wanted to say "...Furthermore, Chow et al
5 teaches wherein the viewing..." Applicants respectfully state that they take exception with the
6 alleged equivalencies of claim 5 and Chow. The cited portion of Chow fails to teach or
7 anticipate the elements of claim 5. Thus claim 5 is allowable for itself and because it depends
8 upon claim 1.

9 *6. As per claim 6, Chow et al teaches the claimed invention as described above.*
10 *Furthermore, Chow et al teaches wherein the viewing device depicts information in a*
11 *form including at least one of: text graphics, images, light display, or any combination of*
12 *these (See page 7, paragraph [0098-0101]).*

13 In response, the applicants assume that the examiner wanted to say "...Furthermore, Chow et al
14 teaches wherein the viewing..." Applicants respectfully state that they take exception with the
15 alleged equivalencies of claim 6 and Chow. The cited portion of Chow fails to teach or
16 anticipate the elements of claim 5. Chow et al fails to teach "wherein the viewing device depicts
17 information in a form including at least one of: text graphics, images, light display, or any
18 combination of these," in page 7, paragraph [0098-0101]). Thus claim 6 is allowable for itself
19 and because it depends upon claim 1.

20 *7. As per claim 7, Chow et al teaches the claimed invention as described above.*
21 *Furthermore, Chow et al teaches wherein the step of selecting includes employing a*
22 *menu (See page 7, paragraph [0100-0101]).*

23 Applicants respectfully state that they take exception with the alleged equivalencies of claim 7
24 and Chow. The cited portion of Chow fails to teach or anticipate the elements of claim 7.
25 Furthermore, Chow's paragraphs [0100-0101] do not teach the use of a menu (of accessible
26 services). Rather, they refer to alternative examples of systems that a subscriber can remotely
27 access and control. The applicants note here the use of the term "subscriber" instead of user,
28 which again emphasizes the necessity of using a service provider (to which a user needs to

DOCKET NUMBER: JP920010520US1

18/33

Serial No. 09/933,625

1 subscribe to) to attain what Chow teaches. No such necessity is imposed by the applicants'
2 invention. Thus claim 7 is allowable for itself and because it depends upon claim 1.

3 *8. As per claim 8, Chow et al teaches the claimed invention as described above.*
4 *Furthermore, Chow et al teaches wherein the step of viewing is performed employing a*
5 *web- browser and the serving entity is a web-server (See page 7, paragraph*
6 *[0098-0101]).*

7 In response, applicants respectfully state that they take exception with the alleged equivalencies
8 of claim 8 and Chow. The cited portion of Chow page 7, paragraph [0098-0101]), fails to teach
9 or anticipate the elements of claim 8. Furthermore, these paragraphs state using the Web browser
10 to access the service provider's Home Networking Web site, yet again underscoring the need for
11 the presence of a service provider in Chow's invention. For the claim 8 invention the Web-server
12 (serving the Web-browser) resides at the serving entity that is located in the residential network,
13 thus not requiring the use of a service provider. Thus claim 8 is allowable for itself and because
14 it depends upon claim 1.

15 *9. As per claim 9 Chow et al teaches the claimed invention as described above.*
16 *Furthermore, Chow et al teaches wherein the step of connecting includes dialing-up to*
17 *the serving entity through a data network to which the serving entity is connected (See*
18 *page 5, paragraphs [0053-0054] and figure 1).*

19 In response, applicants respectfully state that they take exception with the alleged equivalencies
20 of claim 9 and Chow. The cited portion of Chow page 5, paragraphs [0053-0054] and figure 1,
21 do not reveal use of the element of claim 9 for service interaction. Chow fails to teach "wherein
22 the step of connecting includes dialing-up to the serving entity through a data network to which
23 the serving entity is connected," as in claim 9. The inventive portion of Chow does not allude to
24 or anticipate claim 9. Thus claim 9 is allowable for itself and because it depends upon claim 1.

25 *10. As per claim 10, Chow et al teaches the claimed invention as described above. Chow*
26 *et al teaches wherein the data network is the Intra-net controlled by an Internet Service*
27 *Provider (See page 5, paragraph [0060-0069]).*

DOCKET NUMBER: JP920010520US1

19/33

Serial No.: 09/933,625

1 In response, applicants respectfully state that they take exception with the alleged equivalencies
2 of claim 10 and Chow. The cited portion of Chow page 5, paragraph [0060-0069]), do not reveal
3 use of the element of claim 10 for service interaction. The inventive portion of Chow does not
4 allude to or anticipate claim 10. Thus claim 10 is allowable for itself and because it depends
5 upon claim 1.

6 *11. As per claim 11, Chow et al the claimed invention as described above. Furthermore,*
7 *Chow et al teaches wherein the data network uses the TCP/IP protocol suite for*
8 *transporting information (See page 4, paragraph [0048]).*

9 In response, applicants respectfully state that they take exception with the alleged equivalencies
10 of claim 11 and Chow. The cited portion of Chow page 4, paragraph [0048]), do not reveal use
11 of the element of claim 11 for service interaction. The inventive portion of Chow does not allude
12 to or anticipate claim 11. Thus claim 11 is allowable for itself and because it depends upon
13 claim 1.

14 *12. As per claim 12, Chow et al teaches the claimed invention as described above.*
15 *Furthermore, Chow et al teaches serving entity employing attributes of said circuit*
16 *switch network in authenticating said user (See page 6, paragraph [0075]).*

17 In response, applicants respectfully state that they take exception with the alleged equivalencies
18 of claim 12 and Chow. The cited portion of Chow page 6, paragraph [0075], do not reveal use of
19 the element of claim 12 for service interaction. The inventive portion of Chow does not allude to
20 or anticipate claim 12. Authentication in Chow does not refer to "employing attributes of said
21 circuit switch network in authenticating said user, as in claim 12. Thus claim 12 is allowable for
22 itself and because it depends upon claim 1.

23 *13. As per claim 13, Chow et al teaches the claimed invention as described above.*
24 *Furthermore, Chow et al teaches wherein said attributes include a telephone number of*
25 *said client device (See page 6, paragraph [0076]).*

26 In response, applicants respectfully state that they take exception with the alleged equivalencies
27 of claim 13 and Chow. The cited portion of Chow page 6, paragraph [0076], do not reveal use of
28 the element of claim 13 for service interaction. The inventive portion of Chow does not allude to

DOCKET NUMBER: JP920010520US1

20/33

Serial No.: 09/933,625

1 or anticipate claim 13. Furthermore, paragraph [0076] does not refer to the use of a telephone
2 number as an authentication means of a user. It rather refers to the use of short messaging to
3 communicate to and from a user. Note that as previously stated, on the return path (from the user
4 to the refrigerator in paragraph [0076]) the short message needs to be converted to a different
5 protocol by the service provider. Thus claim 13 is allowable for itself and because it depends
6 upon claim 1.

7 *14. As per claim 4, Chow et al teaches the claimed invention as described above.*
8 *Furthermore, Chow et al teaches wherein said attributes include a telephone number of*
9 *said serving entity (See page 6, paragraph [0076]).*

10 In response, the applicants respectfully state that this refers to claim 14 not claim 4. Applicants
11 respectfully state that they take exception with the alleged equivalencies of claim 14 and Chow.
12 The cited portion of Chow page 6, paragraph [0076], do not reveal use of the element of claim 14
13 for service interaction. Chow fails to teach "wherein said attributes include a telephone number
14 of said serving entity, as in claim 14. The inventive portion of Chow does not allude to or
15 anticipate claim 14. Thus claim 14 is allowable for itself and because it depends upon claim 1.

16 *15. As per claim 15, Chow et al teaches the claimed invention as described above,*
17 *Furthermore, Chow et al teaches establishing credentials so that said at least one remote*
18 *service can be manipulated in a secure manner on the serving entity (See page 6,*
19 *paragraph [0075]).*

20 In response, the applicants respectfully state that they take exception with the alleged
21 equivalencies of claim 15 and Chow. The cited portion of Chow page 6, paragraph [0075], do
22 not reveal use of the element of claim 15 for service interaction. Chow fails to teach "establishing
23 credentials so that said at least one remote service can be manipulated in a secure manner on the
24 serving entity," as in claim 15. The inventive portion of Chow does not allude to or anticipate
25 claim 15. Thus claim 15 is allowable for itself and because it depends upon claim 1.

26 *16. As per claim 16, Chow et al teaches the claimed invention as described above.*
27 *Furthermore, Chow et al teaches wherein the step of viewing views the list on a viewing*
28 *device in a manner that depends on the user's access privileges to said at least one*
29 *remote service (See page 4, paragraph [0036]).*

DOCKET NUMBER: JP920010520US1

21/33

~~Serial No.: 09/933,625~~

1 In response, the applicants respectfully state that they take exception with the alleged
2 equivalencies of claim 16 and Chow. The cited portion of Chow page 4, paragraph [0036], does
3 not reveal use of the element of claim 16 for service interaction. Chow fails to teach "wherein the
4 step of viewing views the list on a viewing device in a manner that depends on the user's access
5 privileges to said at least one remote service," as in claim 16. The inventive portion of Chow
6 does not allude to or anticipate claim 16. Thus claim 16 is allowable for itself and because it
7 depends upon claim 1. Furthermore, paragraph [0036], aside from the use of a service provider,
8 does not teach the viewing of services that can be controlled in a manner that depends on the
9 (service) access privileges. For example, [0036] does not teach (as applicants' claim 16 allows
10 and protects) that, say, the adults in a house have access to both the A/C and heating services for
11 the whole house, while the children may access these service only as applicable to their own
12 bedrooms. The inventive portion of Chow does not allude to or anticipate claim 16. Thus claim
13 16 is allowable for itself and because it depends upon claim 1.

14 *17. As per claim 17, Chow et al teaches the claimed invention as described above.*
15 *Furthermore, Chow et al teaches the serving entity providing access to at least one*
16 *service agent used to access and control said at least one remote service (See page 6,*
17 *paragraph [0075]).*

18 In response, the applicants respectfully state that they take exception with the alleged
19 equivalencies of claim 17 and Chow. The cited portion of Chow page 6, paragraph [0075], does
20 not reveal use of the element of claim 17 for service interaction. Chow fails to teach "*the serving*
21 *entity providing access to at least one service agent used to access and control said at least one*
22 *remote service,"* as in claim 17. The inventive portion of Chow does not allude to or anticipate
23 claim 17. Thus claim 17 is allowable for itself and because it depends upon claim 1.
24 Furthermore, paragraph [0075] does not teach the use of service agent to access and control a
25 remote service. It simply states the use of short messages to communicate with a device, e.g., a
26 thermostat. Again, this paragraph implies the necessary presence of (among others) a short
27 messaging service provider to facilitate the communication and remote control of devices in a
28 home/SOHO network from a remotely located subscriber.

DOCKET NUMBER: JP920010520US1

22/33

Serial No.: 09/933,625

1 *18. As per claim 18, Chow et al teaches the claimed invention as described above.*
2 *Furthermore, Chow et al teaches wherein at least one of said at least one service agent is*
3 *a computer software module executable on a computer (See page 6, paragraph [0075]).*

4 In response, the applicants respectfully state that they take exception with the alleged
5 equivalencies of claim 18 and Chow. The cited portion of Chow page 6, paragraph [0075], does
6 not reveal use of the element of claim 18 for service interaction. Chow fails to teach "wherein at
7 least one of said at least one service agent is a computer software module executable on a
8 computer," as in claim 18, or any service agent. Furthermore, paragraph [0075] does not teach
9 the use of software (service) agent to access and control a remote service. It simply states the use
10 of short messages to communicate with a device, e.g., a thermostat. Again, this paragraph implies
11 the necessary presence of (among others) a short messaging service provider to facilitate the
12 communication and remote control of devices in a home/SOHO network from a remotely located
13 subscriber. The inventive portion of Chow does not allude to or anticipate claim 18. Thus claim
14 18 is allowable for itself and because it depends upon claim 1.

15 *19. As per claim 19, Chow et al teaches the claimed invention as described above.*
16 *Furthermore, Chow et al teaches activating said software module prior to invoking a*
17 *particular remote service (See page 6, paragraph [0075]).*

18 In response, the applicants respectfully state that they take exception with the alleged
19 equivalencies of claim 19 and Chow. The cited portion of Chow page 6, paragraph [0075], does
20 not reveal use of the element of claim 19 for service interaction. Chow fails to teach "activating
21 said software module prior to invoking a particular remote service," as in claim 19.
22 Furthermore, paragraph [0075] does not teach the activation of a software agent controlling
23 service prior to communicating with the agent and then remotely controlling the service. It
24 simply states the use of short messages to communicate with a device, e.g., a thermostat. Again,
25 this paragraph implies the necessary presence of (among others) a short messaging service
26 provider to facilitate the communication and remote control of devices in a home/SOHO network
27 from a remotely located subscriber. Note that this claim in the applicants' invention allows
28 deactivating certain services (e.g., heating control during summertime) for various reasons, e.g.,
29 conserving resources, extending the lifetime, etc., of various service control components and this

DOCKET NUMBER: JP920010520US1

23/33

Serial No.: 09/933,625

1 is not a feature taught by Chow's invention. The inventive portion of Chow does not allude to or
2 anticipate claim 19. Thus claim 19 is allowable for itself and because it depends upon claim 1.

3 *20. As per claim 20, Chow et al teaches the claimed invention as described above.*
4 *Furthermore Chow teaches activating said software module on demand after a*
5 *particular remote service has been invoked (See page 6, paragraph [0075-0078]).*

6 In response, the applicants respectfully state that they take exception with the alleged
7 equivalencies of claim 20 and Chow. The cited portion of Chow page 6, paragraph [0075-0078],
8 does not reveal use of the element of claim 20 for service interaction. Chow fails to teach
9 "activating said software module on demand after a particular remote service has been invoked,"
10 as in claim 20. Furthermore, paragraphs [0075-0078] do not teach the dependent/conditional
11 activation of agent software modules. Chow simply teaches the creation of "monolithic"
12 applications, e.g., accessing and maintaining the refrigerator. Contrary to the applicants' claim,
13 they not teach for the arbitrary composition of new controllable services from already existing
14 ones, as will be the case when a service can be activated (e.g., enable coffee brewing) when a
15 previous service is activated as well (e.g., adjust kitchen temperature in the morning). Thus claim
16 20 is allowable for itself and because it depends upon claim 1.

17 *21. As per claim 21, Chow et al in teaches the claimed invention as described above.*
18 *Furthermore, Chow teaches storing said software module at a data repository (See 6,*
19 *paragraph [0075]).*

20 In response, the applicants respectfully state that they take exception with the alleged
21 equivalencies of claim 21 and Chow. The cited portion of Chow page 6, paragraph [0075], does
22 not reveal use of the element of claim 21 for service interaction. Chow fails to teach "activating
23 said software module prior to invoking a particular remote service," as in claim 21. Furthermore,
24 paragraph [0075] does not teach anything about storing software modules. Thus claim 21 is
25 allowable for itself and because it depends upon claim 1.

26 *22. As per claim 22, Chow et al teaches the claimed invention as described above.*

DOCKET NUMBER: JP920010520US1

24/33

Serial No.: 09/933,625

1 *Furthermore, Chow et al teaches dynamically retrieving and activating said software*
2 *module from the data repository after invoking a particular remote service (See page 6,*
3 *paragraph [0075-0078]).*

4 In response, the applicants respectfully state that they take exception with the alleged
5 equivalencies of claim 22 and Chow. The cited portion of Chow page 6, paragraph [0075-0078],
6 does not reveal use of the element of claim 22 for service interaction. Chow fails to teach
7 "dynamically retrieving and activating said software module from the data repository after
8 invoking a particular remote service," as in claim 22.. Furthermore, paragraphs [0075-0078] do
9 not teach anything about dynamically retrieving and activating software modules after invoking a
10 particular remote service. Instead, they simply describe "monolithic" application examples. Thus
11 claim 22 is allowable for itself and because it depends upon claim 1.

12 *23. As per claim 23, Chow et al teaches the claimed invention as described above.*
13 *Furthermore, Chow et al teaches Sharma et al teaches wherein said wireless,*
14 *circuit-switched voice telephony network is a first generation, analog, cellular network*
15 *(See page 5, paragraph [0058]).*

16 In response, the applicants respectfully state that they take exception with the alleged
17 equivalencies of claim 23 and Chow. The cited portion of Chow page 5, paragraph [0058], does
18 not reveal use of the element of claim 23 for service interaction. Chow fails to teach "wherein
19 said wireless, circuit-switched voice telephony network is a first generation, analog, cellular
20 network," as in claim 23. Furthermore, Chow et al teaches wherein said wireless..." In this case
21 they respectfully state that this is a dependent claim (dependent on claim 1) and it should be
22 interpreted within the context of claim 1 that the applicants have respectfully previously to be
23 valid. Thus claim 23 is allowable for itself and because it depends upon claim 1.

24 *24. As per claim 24, Chow et al teaches the claimed invention as described above.*
25 *Furthermore, Chow et al teaches wherein said wireless, circuit-switched, voice telephony*
26 *network is a second generation, digital, cellular network (See page 5, paragraph*
27 *[0054-0058]).*

28 In response, the applicants respectfully state that they take exception with the alleged
29 equivalencies of claim 24 and Chow. The cited portion of Chow page 6, paragraph [0075], does

DOCKET NUMBER: JP920010520US1

25/33

Serial No.: 09/933,625

1 not reveal use of the element of claim 24 for service interaction. Chow fails to teach "wherein
2 said wireless, circuit-switched, voice telephony network is a second generation, digital, cellular
3 network," as in claim 24. Thus claim 23 is allowable for itself and because it depends upon
4 claim 1.

5 *25. As per claim 25, Chow et al teaches the claimed invention as described above.*
6 *Furthermore, Chow et al teaches wherein the step of dialing-up directly to the service*
7 *entity further includes passing dialing signaling and control data to the serving entity*
8 *through an intermediary data network (See figure 1).*

9 In response, the applicants respectfully state that they take exception with the alleged
10 equivalencies of claim 25 and Chow. The cited portion of Chow Fig. 1, does not reveal use of
11 the element of claim 25 for service interaction. Chow fails to teach "wherein the step of
12 dialing-up directly to the service entity further includes passing dialing signaling and control data
13 to the serving entity through an intermediary data network," as in claim 25. Thus claim 25 is
14 allowable for itself and because it depends upon claim 1.

15 *26. As per claim 26, Chow et al teaches the claimed invention as described above.*
16 *Furthermore, Chow et al teaches wherein the step of dialing-up to the serving entity*
17 *through a data network, further includes dialing-up to the serving entity through a*
18 *sequence of at least one data network, the last one of which the serving entity is attached*
19 *to (See figure 1 and pages 4 and 5).*

20 In response, the applicants respectfully state that they take exception with the alleged
21 equivalencies of claim 26 and Chow. The cited portion of Chow Fig. 1, does not reveal use of
22 the element of claim 26 for service interaction. Chow fails to teach "wherein the step of
23 dialing-up to the serving entity through a data network, further includes dialing-up to the serving
24 entity through a sequence of at least one data network, the last one of which the serving entity is
25 attached to," as in claim 26. Thus claim 26 is allowable for itself and because it depends upon
26 claim 1.

27 *27. As per claim 30, Chow et al teaches the claimed invention as described above.*
28 *Furthermore, Chow et al teaches a computer program product comprising a computer*
29 *usable medium having computer readable program code means embodied therein for*

DOCKET NUMBER: JP920010520US1

26/33

Serial No.: 09/933,625

1 *causing a user to interact with at least one remote service, the computer readable*
2 *program code means in said computer program product comprising computer readable*
3 *program code means for causing a Computer to effect the functions of claim 28 (See page*
4 *6, paragraph [0075-0078]).*

5 Applicants note that in as much as office communication fails to show any referenced
6 anticipation of claim 27 and 28, these are assumed allowable over the cited reference. Thus
7 claim 30 is allowable because it depends on an allowable claim 28. Besides, applicants
8 respectfully state that they take exception with the alleged equivalencies of claim 30 and Chow.
9 The cited portion of Chow page 6, paragraph [0075-0078], does not reveal use of the element of
10 claim 30 for service interaction. Chow fails to teach "a computer program product comprising a
11 computer usable medium having computer readable program code means embodied therein for
12 causing a user to interact with at least one remote service, the computer readable program code
13 means in said computer program product comprising computer readable program code means for
14 causing a Computer to effect the functions of claim 28," as in claim 30. Chow do not teach
15 about a computer program product comprising of the components and capable of effecting the
16 functions described in claim 30 of the applicants' invention. Furthermore, paragraphs
17 [0075-0078] do not teach anything about dynamically retrieving and activating software modules
18 after invoking a particular remote service. Instead, they simply describe "monolithic" application
19 examples. Thus claim 30 is allowable for itself and because it ultimately depends upon claim 1.

20 *28. As per claim 31, Chow et al teaches a broadband network with enterprise wireless*
21 *communication systems for residential and business environment. Furthermore, Chow et*
22 *al teaches an apparatus attaches on a home network for a user using a client device*
23 *attached to a wireless, circuit-switched, voice telephony network, to interact with at least*
24 *one service on said home network, said apparatus comprising: a telephone modem to*
25 *directly receive an incoming call from a client device (See page 4, paragraph [0048] and*
26 *page 11, paragraph [00139]), and also to receive and transmit data over a telephone*
27 *network, said telephone modem having a client port through which the apparatus*
28 *attaches to the telephone network (See page 1, paragraph [0012]), said apparatus being*
29 *a single apparatus through which a use with the user client device can establish*
30 *communication in one step, said client device employing only one of a cellular voice*
31 *network and a PSTN (See page 5, paragraph [0054-0058]); a dial-in service module to*
32 *implement dial-in logic for the client device; a browser server module for managing data*
33 *for remote display (See page 4, paragraph [0038-0040]); and a protocol transport*
34 *module to : implement protocols needed to transport data back and forth between a*

DOCKET NUMBER: JP920010520US1

27/33

Serial No.: 09/933,625

1 *browser application in the client device and a browser server module (See page 2,*
2 *paragraph [0014]).*

3 In response, the applicants respectfully state that they take exception with the alleged
4 equivalencies of claim 31 and Chow. The cited portion of Chow Fig. 1, does not reveal use of
5 the element of claim 31 for service interaction. Chow fails to teach the apparatus of claim 31.

6 Claim 31 reads:

7 31. An apparatus attached on a home network for a user using a client device attached to
8 a wireless, circuit-switched, voice telephony network, to interact with at least one service
9 on said home network, said apparatus comprising:

10 a telephone modem to directly receive an incoming call from the client device, and also to
11 receive and transmit data over a telephone network, said telephone modem having a client
12 port through which the apparatus attaches to the telephone network, said apparatus being
13 a single apparatus through which a user with the client device can establish
14 communication in one step,
15 said client device employing only one of a cellular voice network and a PSTN;

16 a dial-in service module to implement dial-in logic for the client device;

17 a browser server module for managing data for remote display; and

18 a protocol transport module to implement protocols needed to transport data back and
19 forth between a browser application in the client device and said browser server module.

20 A review of the cited portions of Chow, page 4, paragraph [0048] and page 11, paragraph
21 [00139]), page 11, paragraph [00139], page 1, paragraph [0012], page 5, paragraph
22 [0054-0058]), and page 2, paragraph [0014]), shows that Chow do not teach accessing an
23 apparatus attached to a home network having a telephone modem for receiving incoming calls,

DOCKET NUMBER: JP920010520US1

28/33

Serial No.: 09/933,625

1 through which an end-user using a user client device can establish communication in one step
2 using only one of a cellular network and a PSTN.

3 Thus Chow does not have the claim 31 components of: a telephone modem to directly receive an
4 incoming call from the client device, a dial-in service module, a browser server module, or a
5 protocol transport module to implement functions stated in claim 31. Instead Chow's invention
6 requires the use of a service provider and involving at least a packet network and a broadband
7 transport network in addition to the use of a public cellular network or the use of PSTN.
8 Furthermore, as Chow Figure 1 shows, the use of cellular networks or PSTN networks is
9 exclusive of each other. Either PSTN is used or cellular network is used. This is contrary to the
10 applicants' invention where, as claim 31 states, "...employing only one of a cellular voice
11 network and a PSTN..." i.e., both of these networks are used together once. This results from the
12 different design points and application spaces that Chow's invention and the applicants'
13 invention address. Chow considers the use of a broadband service provider where end-user
14 devices must connect to residential devices that they control using the broadband service
15 provider. All the teachings by Chow need to be viewed within this operational context. Contrary,
16 in the applicants' invention the objective is to permit control of services without the necessity of
17 a broadband service provider, hence, the end-user devices are allowed to connect directly through
18 the cellular network and PSTN to the serving entity that could be placed at home. Hence, the
19 applicants respectfully state that claim 31 is not anticipated by, and is allowable, over the cited
20 reference..

21 *29. As per claim 32, Chow et al teaches the claimed invention as described above.*
22 *Furthermore, Chow et al teaches wherein said browser server is used to obtain, organize,*
23 *and manipulate data received from and data sent to the client device through the protocol*
24 *transport module (See page 5, paragraph [0052]).*

25 In response, the applicants respectfully state that they take exception with the alleged
26 equivalencies of claim 31 and Chow. The cited portion of Chow page 5, paragraph [0052], does
27 not reveal use of the element of claim 31 for service interaction. Chow fails to teach "wherein
28 said browser server is used to obtain, organize, and manipulate data received from and data sent
29 to the client device through the protocol transport module, as in claim 32. Furthermore, Chow

DOCKET NUMBER: JP920010520US1

29/33

Serial No.: 09/933,625

1 paragraph [0052] refers to a device (NSP) that is owned by and located in the broadband service
2 providers' premises. In contrast, the browser server module in claim 31 of the applicants'
3 invention is part of an apparatus residing at a residential network, and it is a feature that enables
4 the applicants' invention to be realized without the necessity of a broadband service provider.
5 Thus claim 32 is allowable for itself and because it ultimately depends upon claim 31.

6 *30. As per claim 33, Chow et al teaches the claimed invention as described above.*
7 *Furthermore, Chow et al teaches wherein said data sent to the client device are displayed*
8 *and viewed by the browser application in the client device (See page 6, paragraph*
9 *[0074-0075]).*

10 In response, the applicants respectfully state that they take exception with the alleged
11 equivalencies of claim 31 and Chow. The cited portion of Chow page 6, paragraph [0074-0075],
12 does not reveal use of the element of claim 31 for service interaction. Chow fails to teach
13 "wherein said browser server is used to obtain, organize, and manipulate data received from and
14 data sent to the client device through the protocol transport module, as in claim 32.
15 Furthermore, paragraphs [0074-0075] refer to the use of a Web server (serving Web browsers in
16 client devices) located at "...the service provider's web site..." In contrast, the browser server
17 module in claim 32 is part of an apparatus residing at a residential network and therefore the
18 Web browsers in the client devices are served without the necessity of a service provider as
19 required by Chow. In addition, paragraphs [0074-0075] only teach the use of a Web browser for
20 logging on the service provider's home networking service and possibly (it is not clear in Chow's
21 invention, if that is indeed the case) using the Web browser to send the short message to adjust
22 the temperature. Chow does not teach using the Web browser for viewing any information
23 related to the controlled service, e.g., what is the current temperature, whether the request to
24 adjust the temperature has been received and processed, whether the temperature adjusting
25 service is actively working to satisfy our request, whether it has finished doing so, etc. Thus
26 claim 33 is allowable for itself and because it ultimately depends upon claim 31.

27 *31. As per claim 34, Chow et al teaches the claimed invention as described above.*
28 *Furthermore, Chow et al teaches wherein said data sent includes a list of services that*
29 *are accessible by the client device (See page 6, paragraph [0078]).*

DOCKET NUMBER: JP920010520US1

30/33

Serial No.: 09/933,625

1 In response, the applicants respectfully state that they take exception with the alleged
2 equivalencies of claim 34 and Chow. The cited portion of Chow page 6, paragraph [0078], does
3 not reveal use of the element of claim 34 for service interaction. Chow fails to teach "wherein
4 said browser server is used to obtain, organize, and manipulate data received from and data sent
5 to the client device through the protocol transport module, as in claim 34. Furthermore,
6 paragraph [0078] refers to possible remote control applications that can be provided through the
7 service provider's broadband packet network. It does not teach about providing the list of
8 services that are accessible by the client device. This, for example, may imply that end-users (or,
9 more accurately, subscribers) will need to consciously use a different access procedure for each
10 service that they would like to control remotely. In contrast claim 34, teaches the use of a
11 browser page that shows a list of all services that can be accessed remotely and control. This
12 allows for a common look-and-feel when accessing and controlling the services remotely rather
13 that providing different user-experience in accessing and controlling the services. Thus claim 34
14 is allowable for itself and because it ultimately depends upon claim 31.

15 *32. As per claim 35, Chow et al teaches the claimed invention as described above.*
16 *Furthermore, Chow et al teaches wherein said data received by the browser application*
17 *in the client device include a selection of at least one service the user of the client device*
18 *controls and an action to be taken for a selected service, and upon receipt of the action*
19 *the browser server interacts with a particular service agent to implement the control*
20 *logic for controlling the selected service, wherein a control signal generated by the*
21 *service agent exits the apparatus through the client port (See page 1, paragraph [0012]*
22 *and page 7, paragraph [0098]).*

23 In response, the applicants respectfully state that they take exception with the alleged
24 equivalencies of claim 35 and Chow. The cited portion of Chow page 1, paragraph [0012] and
25 page 7, paragraph [0098], does not reveal use of the element of claim 35 for service interaction.
26 Chow fails to teach "wherein said data received by the browser application in the client device
27 include a selection of at least one service the user of the client device controls and an action to be
28 taken for a selected service, and upon receipt of the action the browser server interacts with a
29 particular service agent to implement the control logic for controlling the selected service,
30 wherein a control signal generated by the service agent exits the apparatus through the client

DOCKET NUMBER: JP920010520US1

31/33

Serial No.: 09/933,625

1 port," as in claim 35. Thus claim 35 is allowable for itself and because it ultimately depends
2 upon claim 31.

3 Also, claim 35 is corrected to better protect the invention.

4 *33. As per claim 36 Chow et al teaches the claimed invention as described above.*
5 *Furthermore, Chow et al teaches wherein said dial-in server module triggers at least one*
6 *particular module in the apparatus to process any incoming calls and requests from a*
7 *client device (See 4 paragraph [0048] and page 5, paragraph [0052]).*

8 In response, the applicants respectfully state that they take exception with the alleged
9 equivalencies of claim 36 and Chow. The cited portion of Chow page 4 paragraph [0048] and
10 page 5, paragraph [0052], does not reveal use of the element of claim 36 for service interaction.
11 Chow fails to teach "wherein said dial-in server module triggers at least one particular module in
12 the apparatus to process any incoming calls and requests from a client device," as in claim 36.
13 Furthermore, paragraphs [0048] and [0052] do not teach the triggering by the dial-in server of at
14 least one particular module in the home apparatus for processing of incoming calls and requests.
15 Instead they refer to a pair of complementary devices, the MTA and the NSP, the first attached to
16 the home/SOHO network and the second located in the service provider's premises and
17 connected to each other through the service provider's broadband transport network. Thus claim
18 36 is allowable for itself and because it ultimately depends upon claim 31.

19 *34. As per claim 37, Chow et al teaches the claimed invention as described above.*
20 *Furthermore, Chow et al teaches wherein said dial-in server module performs user*
21 *authentication (See page 6, paragraph [0075]).*

22 In response, the applicants respectfully state that they take exception with the alleged
23 equivalencies of claim 37 and Chow. The cited portion of Chow page 6 paragraph [0075], does
24 not reveal use of the element of claim 37 for service interaction. Chow fails to teach "wherein
25 said dial-in server module performs user authentication," as in claim 37. Thus claim 36 is
26 allowable for itself and because it ultimately depends upon claim 31.

DOCKET NUMBER: JP920010520US1

32/33

Serial No.: 09/933,625

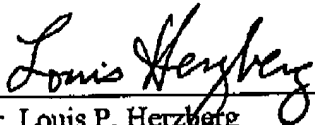
- 1 It is anticipated that this amendment brings allowance of claims 1-37. If any question remains,
2 please contact the undersigned before issuing an office communication with a FINAL status.
- 3 Please charge any fee necessary to enter this paper to deposit account 50-0510.

4

Respectfully submitted,

5

By:


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8

9

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33/33

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